

EXHIBIT G

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
No. 07 civ. 8718 (RMB)

-----x
SIRI DIAZ, CAROLYN SIEGEL, TALIA BUMB,
BLERTA VIKKI, DANIELLE OWIMRIN, on behalf
of themselves and all others similarly
situated,

Plaintiffs,

- against -

SCORES HOLDING COMPANY, INC.; GO WEST
ENTERTAINMENT, INC., a/k/a SCORES WEST
SIDE; and SCORES ENTERTAINMENT, INC.,
a/k/a SCORES EAST SIDE,

Defendants.

-----x
February 7, 2008
10:00 a.m.

Deposition of CURTIS SMITH,
taken by Plaintiffs, pursuant to Notice,
held at the offices of Outten & Golden
LLP, 3 Park Avenue, New York, New York,
before Jineen Pavesi, a Registered
Professional Reporter, Registered Merit
Reporter, Certified Realtime Reporter and
Notary Public of the State of New York.

A P P E A R A N C E S :

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BY: NEIL CAPOBIANCO, ESQ.

1 SMITH

2 company Go West Entertainment?

3 A. Yes, sir.

4 Q. Can you tell me what it is.

5 A. Go West Entertainment is a
6 sublicensee of Entertainment Management
7 Services, Inc..

8 Q. What is your understanding of
9 Scores Entertainment, Inc.?

10 A. I don't have an understanding
11 of Scores Entertainment, Inc.

12 Q. Do you know who the
13 shareholders of Scores Entertainment,
14 Inc., are?

15 A. I have never come in contact
16 with Scores Entertainment, Inc.

17 Q. Do you know who the
18 shareholders of Go West Entertainment are?

19 A. Richard Goldring and Elliot
20 Osher.

21 Q. Who is Mr. Goldring?

22 A. Shareholder.

23 Q. Does he have any relationship
24 with Scores Holding Company?

25 A. Yes, he is the shareholder in

1 SMITH

2 Scores Holding Company.

3 Q. Who are the shareholders in
4 Scores Holding Company at the present?

5 A. Scores Holding Company is a
6 public company, we have many shareholders.

7 Q. Can you name the shareholders
8 of Scores Holding Company that own more
9 than 10 percent of the shares of the
10 company at present?

11 A. Richard Goldring.

12 Q. Any others?

13 A. Not to my understanding.

14 Q. What is his ownership interest
15 at the present of Scores Holding Company?

16 A. 46 percent.

17 Q. Are you familiar whether there
18 are articles of incorporation of Scores
19 Holding Company?

20 A. Yes, sir.

21 Q. Do you know where they are
22 physically maintained at present?

23 A. At our West 27th Street
24 address.

25 Q. Are there any other officers of

1 SMITH

2 Scores Holding Company at the present?

3 A. Yes, there is a secretary; do
4 you consider a president an officer?

5 Q. Yes.

6 A. President.

7 Q. That would be a president
8 separate from the CEO?

9 A. Yes.

10 Q. Who is the president of Scores
11 Holding Company?

12 A. John Neilson.

13 Q. How long has Mr. Neilson been
14 president of Scores Holding Company?

15 A. Probably less than six months,
16 about six months or so.

17 Q. Prior to that, did Scores
18 Holding Company have a president?

19 A. Richard Goldring.

20 Q. Was there any arrangement
21 whereby Scores Entertainment, Inc., makes
22 payments to Scores Holding Company?

23 A. No, sir.

24 Q. Is there a licensing
25 arrangement between Scores Holding Company

SMITH

been any business dealings or business relationships between Scores Holding Company and Scores Entertainment, Inc.?

A. Can you repeat the dates.

Q. Last six years roughly, has there been any business affiliation or relationship between Scores Holding Company and Scores Entertainment, Inc.?

A. Not to my knowledge, no.

Q. When was Scores Holding Company first formed?

A. It was formed in 2002 -- 2001 or 2002.

Q. Were you an officer or employee of Scores Holding Company at the time of its formation?

A. No, sir.

Q. Sorry?

A. No, sir.

Q. When did you first start working for Scores Holding Company?

A. August 2005.

Q. Prior to that did you have any dealings with the company or businesses?

1 SMITH

2 A. No, sir.

3 Q. Where did you work prior to
4 August 2005?

5 A. I worked for Cornick Garber
6 Sandler, public accounting firm.

7 Q. You mentioned earlier someone
8 by the name of Elliot Osher, do you recall
9 that?

10 A. Yes.

11 Q. What is Mr. Osher's current
12 relationship, if any, with Scores Holding
13 Company?

14 A. He is a shareholder.

15 Q. Do you know what his interest
16 in Scores Holding Company is at the
17 present?

18 A. Last I recall, he was an 8.8
19 percent.

20 Q. Do you know if Mr. Osher is a
21 shareholder of Go West Entertainment?

22 A. I believe he is.

23 Q. What is the basis of your
24 knowledge?

25 A. Just through inquiry.

SMITH

Q. Have you met Mr. Osher?

A. Yes, sir.

Q. How frequently do you interact with Mr. Osher?

A. Not often.

Q. Are you aware of any other shareholders of Go West Entertainment?

A. No.

Q. Do you know whether Mr. Goldring is an officer of that company?

A. I am not really sure.

Q. Do you know whether or not Mr. Goldring is an officer or shareholder of Scores Entertainment, Inc.?

A. No.

Q. Are you familiar with a Scores club operated in the City of New York?

A. Yes.

Q. What is the basis of your knowledge?

A. They are sublicensees of EMS and they pay a royalty to EMS and EMS pays a royalty to Scores Holding Company.

1 SMITH

2 Q. Who in particular at Cozen
3 O'Connor handles this matter for your
4 company --

5 A. Well, there really --

6 Q. You may anticipate the answer
7 to my question, but it is important for
8 the court reporter to record what I'm
9 saying so that we have a clean record, so
10 if you could just hold off in answering
11 until after I finish.

12 You were saying?

13 A. It really wasn't a settlement
14 between the holding company and SEI
15 exclusively; I think it was a joint
16 settlement with the holding company and
17 other parties, I believe, Go West and 333
18 and I think Richard Gorman and some
19 individuals, so it may have been a
20 settlement that was probably settled
21 through their attorney, through their
22 counsel, on behalf of Scores Holding
23 Company, which named them party to that
24 agreement.

25 Q. You just mentioned an entity

SMITH

333 East 60th Street, Inc., do you recall that?

A. Yes, sir.

Q. Can you tell me what that is.

A. That is a club operated on East 60th Street which has a sublicense with EMS.

Q. At present, do you know who the corporate officers of 333 East 60th Street Incorporated are?

A. I don't know.

Q. Do you know who works or is employed by that company?

A. What do you mean?

Q. I want to know if you know 333 East 60th Street Incorporated employs anyone.

A. It is a club that operates, it probably employs individuals, yes.

Q. Do you know who they are?

A. I do not.

Q. Do you know whether Mr. Goldring has any association with 333 East 60th Street, Inc., at the present?

SMITH

A. I believe Mr. Goldring is a shareholder.

Q. What is the basis of your knowledge?

A. Direct inquiry.

Q. Do you interact with Mr. Goldring from time to time?

A. No, sir.

Q. Have you met Mr. Goldring?

A. I have.

Q. When was that?

A. The last I met him?

Q. Yes.

A. The last I spoke with him?

Q. Yes.

A. I don't recall the last I spoke with Mr. Goldring.

Q. Was it this year?

A. Yes.

Q. How frequently do you interact with Mr. Goldring?

A. We do not interact with Mr. Goldring quite often.

Q. Why is that?

1 SMITH

2 A. Mr. Goldring at the present
3 time had to divest himself from any public
4 dealing with Scores Holding Company, Inc.,
5 pursuant to a plea agreement with the D.A.

6 Q. But nonetheless Mr. Goldring is
7 a 46 percent shareholder of Scores Holding
8 Company?

9 A. Yes, sir.

10 Q. And he is also a shareholder of
11 Go West Entertainment, is that correct?

12 A. Yes, sir.

13 Q. And also a shareholder of 333
14 East 60th Street, Inc., correct?

15 A. Yes, sir.

16 Q. Aside from Mr. Goldring, are
17 there any other shareholders of 333 East
18 60th Street, Inc.?

19 A. I believe it is Elliot Osher.

20 Q. Is Mr. Osher also a shareholder
21 of Go West Entertainment, Inc.?

22 A. Yes, sir.

23 Q. And that's also true of
24 Mr. Osher, he is also a shareholder of
25 Scores Holding Company?

1 SMITH

2 A. Yes, sir.

3 Q. Are you familiar with the
4 management structure of Go West
5 Entertainment, Inc., at the present?

6 A. No, sir.

7 Q. Do you know whether
8 Mr. Goldring has any active role in the
9 running of Go West Entertainment, Inc.?

10 A. No, sir.

11 Q. Do you know what the principal
12 asset of Go West Entertainment, Inc., is?

13 A. No, sir.

14 Q. Are you familiar with the
15 Scores strip club in New York City?

16 A. I know it is a sublicensee of
17 EMS; I don't get too involved with the
18 operations of the club.

19 Q. Do you know whether Go West
20 Entertainment runs the strip club in New
21 York?

22 A. Yes.

23 Q. You do know that?

24 A. Yes.

25 Q. Have you been to the Go West

1 SMITH

2 which is a trademark wholly-owned by
3 Scores Holding Company, for the usage of
4 that trademark to be used for adult
5 entertainment establishment purposes and
6 for merchandising exclusively.

7 Q. Is there a document that
8 describes that business arrangement?

9 A. Yes, that's on the master
10 license agreement.

11 Q. Do you have a copy of the
12 master license agreement?

13 A. No, I don't.

14 Q. Does that document exist in
15 Scores Holding Company's business records?

16 A. It is in our public filings,
17 yes.

18 Q. Generally speaking, what are
19 the terms of the master license agreement?

20 A. To my understanding, it is for
21 20 years and I think for ten consecutive
22 20-year periods thereafter.

23 I believe it may have been six
24 years and -- something like that, that's
25 what I recall to my understanding.

1 SMITH

2 I don't know exactly what it
3 is, but I know it has got consecutive
4 20-year period after the first six years.

5 Q. You testified earlier that
6 Mr. Goldring was a shareholder of
7 Entertainment Management Services, is that
8 correct?

9 A. Yes, sir.

10 Q. I don't recall, are there any
11 other shareholders of Entertainment
12 Management Services, to your knowledge?

13 A. Richard Goldring, Elliot Osher
14 and Harvey Osher.

15 Q. Were you an officer of Scores
16 Holding Company at the time that the
17 master license agreement you just
18 described between Scores Holding Company
19 and Entertainment Management Services was
20 executed?

21 A. No, sir.

22 Q. Who was the CEO at the time
23 that the master license agreement between
24 Scores Holding Company and Entertainment
25 Management Services was executed?

1 SMITH

2 A. As I recall, it may have been
3 Mr. Richard Goldring.

4 Q. So at the time the master
5 license agreement in place between Scores
6 Holding Company was executed, Mr. Goldring
7 was both the CEO of Scores Holding Company
8 and also a shareholder of Entertainment
9 Management Services, correct?

10 A. Yes, sir.

11 Q. Do you know when that master
12 license agreement was first executed, the
13 date, between Scores Holding Company and
14 Entertainment Management Services?

15 A. I believe it was in 2003,
16 March.

17 Q. What is the basis of your
18 knowledge?

19 A. Examining the document.

20 Q. At the time in March of 2003,
21 are you aware of Mr. Goldring's interest
22 in Scores Holding Company?

23 A. No -- say that again, sir.

24 Q. At the time in March 2003, do
25 you know what Mr. Goldring's ownership

1 SMITH

2 encountered any employee of Entertainment
3 Management Services during your time at
4 Scores Holding Company?

5 A. At that location, no.

6 Q. At any location?

7 A. No.

8 Q. Do you interact with a
9 representative of Entertainment Management
10 Services at any point?

11 A. Sometimes, you know, I speak
12 with Mr. John Neilson, but I don't know if
13 he is acting on behalf of Entertainment
14 Management Services, but I know he is the
15 one who orchestrates the sublicense
16 agreements between EMS and the
17 sublicensees and usually I consult to
18 Mr. Neilson in terms of payment for
19 royalties.

20 But Mr. Neilson is not always
21 physically located in the office, he is in
22 Florida and sometimes he is in New York.

23 Q. Does Scores Holding Company
24 receive payments from Entertainment
25 Management Services?

1 SMITH

2 A. Yes, sir.

3 Q. How often?

4 A. Monthly.

5 Q. Who signs the checks that are
6 issued by Entertainment Management
7 Services made payable to Scores Holding
8 Company?

9 A. Richard Goldring.

10 Q. Is Mr. Goldring also a
11 signatory on business bank accounts
12 maintained by Scores Holding Company?

13 A. No, sir.

14 Q. Has Scores Holding Company
15 issued checks to Mr. Goldring from time to
16 time?

17 A. During what period?

18 Q. At any point.

19 A. Yes.

20 Q. Can you describe those
21 payments, please.

22 A. Payments for salary.

23 Q. Mr. Goldring is a salaried
24 employee of Scores Holding Company?

25 A. Not at the present moment.

1 SMITH

2 Q. When was the last time
3 Mr. Goldring was an employee of Scores
4 Holding Company?

5 A. Mr. Goldring resigned on
6 February 28, 2007.

7 Q. Prior to that time was
8 Mr. Goldring an employee of Scores Holding
9 Company?

10 A. Yes, sir.

11 Q. For what period of time was
12 that?

13 A. Mr. Goldring had an employment
14 agreement from I believe it was 2003 up
15 until the point he resigned, March of '03.

16 Q. During that time frame, how
17 much was Mr. Goldring paid as an employee
18 of Scores Holding Company?

19 A. He was paid approximately
20 \$104,000.

21 Q. For that can you describe
22 Mr. Goldring's services that he provided
23 for Scores Holding Company?

24 A. He was president of the
25 company.

1 SMITH

2 Q. Other than having a corporate
3 officer title, did Mr. Goldring perform
4 any day-to-day duties for Scores Holding
5 Company?

6 A. No, sir.

7 Q. Why was Mr. Goldring paid a
8 salary for a corporate officer title only?

9 A. He was paid as the president of
10 the holding company.

11 Q. As the president of the holding
12 company, did he have any duties and
13 responsibilities to the shareholders of
14 Scores Holding Company?

15 A. As CEO and president, yes.

16 Q. Can you describe generally his
17 duties and functions as the president of
18 Scores Holding Company during the time
19 period that he was employed by that
20 company, Scores Holding Company?

21 A. I guess he acted as a fiduciary
22 of the public company, to insure he would
23 get into contracts, I believe he got into
24 a contract with EMS, he would bind the
25 company in a capacity that would seem

1 SMITH

2 Under the master license agreement, we
3 granted EMS, which is 50 percent owned by
4 Richard Goldring, our former chief
5 executive officer and director, an
6 exclusive worldwide license to use and
7 grant sublicenses to use our Scores
8 trademark. EMS has entered into
9 sublicense agreements with eight cabaret
10 clubs, seven of which are currently
11 operated under the Scores trademark."

12 Do you see that reference?

13 A. Yes, sir.

14 Q. Were you an officer of Scores
15 Holding Company at the time that Scores
16 Holding Company negotiated the master
17 license agreement referenced here?

18 A. No, sir.

19 The original master license
20 agreement?

21 Q. I am asking about the amended
22 and restated master license agreement.

23 A. Yes, the restated master
24 license agreement, yes.

25 Q. Who did you negotiate with, who

1 SMITH

2 was representing EMS at that time?

3 A. Mr. Goldring.

4 Q. Did Mr. Goldring have counsel?

5 A. Yes, sir.

6 Q. Who was that?

7 A. Steve Gutstein.

8 Q. Who is Mr. Gutstein?

9 A. Mr. Goldring's counsel.

10 Q. Do you know which firm he is
11 with?

12 A. No, sir.

13 Q. Did Scores Holding Company have
14 counsel at the time that the amended and
15 restated master license agreement
16 referenced in the SEC filing before you,
17 Plaintiffs' Exhibit 2, was there counsel
18 present as well?

19 A. Yes, sir.

20 Q. Who was that?

21 A. Gotbetter & Partners.

22 Q. Generally can you describe the
23 nature of the negotiation between Scores
24 Holding Company and EMS on or about
25 November 13, 2006, that led to the

1 SMITH

2 execution of an amended and restated
3 master license agreement.

4 A. Yes.

5 Mr. Goldring, who was the
6 president and CEO of Scores Holding
7 Company at the time, and was a shareholder
8 of EMS, we were collecting -- the holding
9 company was collecting from EMS a hundred
10 percent of the royalties; pursuant to the
11 original master license agreement, it read
12 that EMS was to retain 50 percent and the
13 holding company was to receive 50 percent.

14 EMS had forwarded all of its
15 royalties over to the holding company and
16 the reason as such is because -- the
17 reason that the restatement came about is
18 due to Mr. Goldring having two controlling
19 positions in the holding company and in
20 EMS.

21 We said for so long as you have
22 a position as president, CEO, or any type
23 of officer in the holding company, and you
24 have assumed a role in EMS, we were going
25 to continue to retain the 100 percent of

1 SMITH

2 the royalties, including -- in addition
3 to that, because Mr. Goldring had received
4 a salary from Scores Holding Company, it
5 would appear that he was double-dipping.

6 Once Mr. Goldring resigned,
7 that is at the point when EMS started to
8 retain his 50 percent, once Mr. Goldring
9 resigned from Scores Holding Company, EMS
10 then therefore retained his 50 percent, he
11 no longer took a salary in Scores Holding,
12 he kept his 50 percent retainage in EMS
13 and that's what the nature of the
14 restatement is.

15 Q. Would you describe the
16 negotiation between Scores Holding Company
17 and Entertainment Management Services on
18 or about November 13, 2006, as an arm's
19 length negotiation?

20 A. Can you repeat that.

21 (Record read.)

22 A. Yes.

23 Q. Yes?

24 A. I believe it was an arm's
25 length negotiation.

1 SMITH

2 Q. Isn't it also true at the time
3 in November 2006 Mr. Goldring was the
4 majority shareholder of both Scores
5 Holding Company and Entertainment
6 Management Services?

7 A. He is -- I don't know what --
8 it says he was 50 percent here in EMS, so
9 I don't know if that's the majority.

10 I believe he is equal, but he
11 was the majority in Scores Holding
12 Company.

13 Q. Notwithstanding that fact, you
14 considered the negotiation between these
15 two entities to be an arm's length
16 transaction?

17 A. Sure.

18 Q. You do?

19 A. Sure.

20 Q. Are you a certified public
21 accountant?

22 A. Yes, sir.

23 Q. Are you familiar with the GAAP
24 rules on accounting?

25 A. Yes, sir.

1 SMITH

2 Q. Do you know what the corporate
3 entity that operates Scores Miami is?

4 A. No, Mr. Goldring has an
5 interest, he is a shareholder, I don't
6 know what his interest is.

7 Q. Mr. Goldring has an ownership
8 interest in Scores Miami?

9 A. Yes, sir.

10 Q. Does EMS or Scores Holding
11 Company receive payments directly from
12 Scores Miami?

13 A. No.

14 Q. Item 5 of Plaintiffs' Exhibit 2
15 for identification, "According to the
16 master license agreement, Scores Holding
17 Company, the Company, is entitled to
18 receive 100 percent of the royalties that
19 EMS receives from these affiliated
20 companies."

21 Do you see that reference?

22 A. Yes.

23 Q. That would mean any payment
24 received in the form of a royalty from
25 Scores Miami would flow directly to Scores

1 SMITH

2 Holding Company at the present, is that a
3 fair statement?

4 A. It would flow through EMS to
5 the holding company, yes.

6 Q. Who at EMS would receive the
7 royalties payments from Scores Miami and
8 other affiliated clubs?

9 A. I guess Mr. Goldring.

10 Q. Do you know that to be the
11 case.

12 A. I am not sure.

13 Q. Are royalty checks made payable
14 to Scores Holding Company by EMS?

15 A. Yes, sir.

16 Q. And who is the signatory on
17 those payments?

18 A. Mr. Goldring.

19 Q. Are you familiar with any other
20 affiliated clubs referenced in Plaintiffs'
21 Exhibit 2 other than the ones you just
22 testified, Scores East, Scores West and
23 now Scores Miami?

24 A. No, sir.

25 Q. Note that there is a reference

1 SMITH

2 to eight cabaret clubs, seven of which
3 currently operate the Scores trademark; do
4 you see that reference, item 5, last
5 sentence --

6 A. Yes, sir.

7 Q. You are not familiar with the
8 other four clubs that have the word Scores
9 or use the trademark of Scores?

10 A. I am.

11 Q. What are those?

12 A. Las Vegas, Chicago, Baltimore,
13 and New Orleans.

14 Q. Do you know whether Mr.
15 Goldring has any ownership interest in the
16 clubs you just identified using the Scores
17 name operated and located in Las Vegas,
18 Chicago, Baltimore and New Orleans?

19 A. He doesn't have any interest in
20 those clubs, to my understanding.

21 Q. Is it a fair statement Mr.
22 Goldring is a shareholder of clubs
23 operated using the Scores trademark in Las
24 Vegas, is that true?

25 A. No.

1 SMITH

2 Licensing Corporation?

3 A. Scores Licensing Corporation is
4 inactive, it just holds the trademarks for
5 the diamond dollar program in the Scores
6 name.

7 Q. Do you know whether Scores
8 Licensing Corporation is a corporation
9 incorporated in the State of New York?

10 A. I believe Scores Licensing
11 Company is incorporated in Delaware.

12 Q. Are there periodic reports
13 filed with the State of Delaware
14 memorializing the corporation of Scores
15 Licensing Corporation?

16 A. Tax return.

17 Q. You're guessing or do you know?

18 A. Tax returns, yes.

19 Q. Who signs the tax returns on
20 behalf of Scores Licensing Corporation?

21 A. It is a consolidated return
22 with Scores Holding Company.

23 Q. Do you sign the tax return for
24 both Scores Holding Company and Scores
25 Licensing Corporation?

1 SMITH

2 A. Yes, sir.

3 Q. Turn to the last page of this
4 document, page 7, do you see that
5 reference, there is a signature on behalf
6 of Scores Holding Company and there is a
7 signature, do you see that?

8 A. Yes.

9 Q. Is that Richard Goldring who
10 signed the document before you,
11 Plaintiffs' Exhibit 5 for identification,
12 on behalf of Scores Holding Company?

13 A. Yes, sir.

14 Q. And to the right there is a
15 signature by somebody representing
16 Entertainment Management Services, do you
17 see that?

18 A. Yes, sir.

19 Q. Do you know who that signature
20 belongs to?

21 A. I believe that's William Osher.

22 Q. Who is that?

23 A. At the time William was a 50
24 percent shareholder in EMS.

25 Q. Do you know whether he

1 SMITH

2 currently maintains an ownership interest
3 in EMS?

4 A. He does not.

5 Q. When did that ownership
6 interest terminate?

7 A. I believe it was sometime in
8 the latter part of 2006.

9 Q. Do you know why that
10 affiliation with Entertainment Management
11 Services terminated?

12 A. No.

13 Q. Do you know where Mr. Osher is
14 presently located?

15 A. Mr. Osher is deceased.

16 Q. Do you know who the current
17 officers of Entertainment Management
18 Services are?

19 A. No.

20 Q. I direct your attention to
21 Plaintiffs' Exhibit 4 for identification,
22 the sublicense agreement.

23 Do you recognize this document?

24 A. Yes, sir.

25 Q. Can you generally describe what

1 SMITH

2 it is.

3 A. This is the license agreement
4 that binds independent operators to take
5 on a license to operate as a Scores for
6 EMS, through EMS.

7 Q. Turning your attention to page
8 6 of this document, Plaintiffs' Exhibit 4,
9 do you see a signature under Entertainment
10 Management Services on behalf of the
11 company?

12 A. Yes, sir.

13 Q. And who is that signature?

14 A. Looks like Mr. Richard
15 Goldring.

16 Q. To the right, on behalf of Go
17 West Entertainment, Inc., there is a
18 signature, do you recognize it?

19 A. Yes, sir.

20 Q. Who is that?

21 A. It appears to be Mr. William
22 Osher.

23 Q. I would like to go back to the
24 master license agreement, Exhibit 5.

25 There is a reference on page 1

SMITH

under license grant, it is Paragraph No. 1, do you see that reference?

A. Yes, sir.

Q. It describes the use of Scores' trademark in connection with the business located at 333 East 60th Street, do you see that reference?

A. Yes, sir.

Q. It describes it as "the original Scores nightclub," do you know what that means?

A. The marquise, the model.

Q. There are other provisions that describe the payment of royalties, paragraph 2, master license agreement, Exhibit 5, do you see that?

A. Yes, sir.

Q. Generally can you describe how those royalty payments are made?

A. Which royalty payments?

Q. It says on page 2, paragraph 2, that the licensee, which appears to be 333 East 60th Street, would make payment to EMS?